

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

**IN RE: CENTURYLINK SALES
PRACTICES AND SECURITIES
LITIGATION**

This Document Relates to:

Civil Action No. 18-296 (MJD/KMM)
Civil Action No. 18-297 (MJD/KMM)
Civil Action No. 18-298 (MJD/KMM)
Civil Action No. 18-299 (MJD/KMM)

MDL No. 17-2795 (MJD/KMM)

**AFFIDAVIT OF MICHAEL D.
BLATCHLEY IN SUPPORT OF
LEAD PLAINTIFF OREGON'S
MOTION FOR CONSOLIDATION
OF RELATED ACTION**

I, Michael D. Blatchley, declare under penalty of perjury as follows:

1. I am a member in good standing of the Bars of the State of New Jersey and the State of New York, and am admitted *pro hac vice* to this Court. I am a partner of the law firm Bernstein Litowitz Berger & Grossmann LLP, Counsel for Lead Plaintiff the State of Oregon by and through the Oregon State Treasurer and the Oregon Public Employee Retirement Board, on behalf of the Oregon Public Employee Retirement Fund ("Oregon"), and Lead Counsel for the Class. I submit this affidavit in support of Oregon's Motion for Consolidation of Related Action.

2. Attached hereto as Exhibit A is a true and correct copy of the notice of pendency of *Inter-Marketing Group USA, Inc. v. CenturyLink, Inc.*, published in *GlobeNewswire* on October 25, 2017.

Dated: March 5, 2018

Respectfully submitted,

/s/ Michael D. Blatchley

John Browne, NYS Bar No. 3922747
Michael D. Blatchley, NYS Bar No. 4747424
**BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP**
1251 Avenue of the Americas
New York, NY 10020
Telephone: (212) 554-1400
Facsimile: (212) 554-1444
johnb@blbglaw.com
michaelb@blbglaw.com

Keith S. Dubanevich, OSB No. 975200
Timothy S. DeJong, OSB No. 940662
Keil M. Mueller, OSB No. 085535
**STOLL STOLL BERNE LOKTING &
SHLACHTER P.C.**
209 SW Oak Street, Suite 500
Portland, OR 97204
Telephone: 503-227-1600
Facsimile: 503-227-6840
kdubanevich@stollberne.com
tdejong@stollberne.com
kmueller@stollberne.com

*Special Assistant Attorneys General and
Counsel for Lead Plaintiff the State of Oregon
by and through the Oregon State Treasurer and
the Oregon Public Employee Retirement Board,
on behalf of the Oregon Public Employee
Retirement Fund, and Lead Counsel for the
Class*

Richard A. Lockridge, MN #64117
Gregg M. Fishbein, MN #202009
Kate M. Baxter-Kauf, MN #392037
LOCKRIDGE GRINDAL NAUEN P.L.L.P
100 Washington Avenue S, Suite 2200
Minneapolis, MN 55401
Telephone: (612) 596-4044
Facsimile: (612) 339-0981

ralockridge@locklaw.com
gmfishbein@locklaw.com
kmbaxter-kauf@locklaw.com

*Local Counsel for Lead Plaintiff the State of
Oregon by and through the Oregon State
Treasurer and the Oregon Public Employee
Retirement Board, on behalf of the Oregon
Public Employee Retirement Fund*